

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ACL1 INVESTMENTS LTD., <i>et al.</i> ,	X	
	:	
Plaintiffs,	:	
	:	
v.	:	No. 19-cv-09014-LLS
	:	
BOLIVARIAN REPUBLIC OF VENEZUELA,	:	
	:	
Defendant.	:	<u>STIPULATION AND</u>
	:	<u>[PROPOSED] ORDER</u>
	:	
	X	

WHEREAS, the Court entered a stipulation on September 14, 2020 adjourning until October 15, 2020 the time for Defendant Bolivarian Republic of Venezuela (the “Republic”) to answer Plaintiffs’ Complaint in order to allow the parties to conduct informal discovery, Dkt. 46;

WHEREAS, Plaintiffs filed a First Amended Complaint (the “FAC”) on October 14, 2020, Dkt. 47;

WHEREAS, the Republic’s response to the FAC is due on October 28, 2020;

WHEREAS, the parties have reached agreement in principle for a partial resolution of the claims asserted in the FAC;

WHEREAS, the parties agree that an adjournment of the Republic’s time to answer or otherwise respond to the FAC would facilitate the parties’ efforts to finalize and document their agreement and to continue to conduct discussions regarding the possibility of resolving the remaining claims;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendant, by their undersigned counsel, that:

1. Defendant's time to answer or otherwise respond to the Complaint is adjourned *sine die*.
2. Either party may terminate the adjournment upon seven (7) days' written notice, and upon such termination the Action will revert to its status as of submission of this Stipulation and [Proposed] Order by the parties.
3. This Stipulation may be executed in counterparts and electronic signatures shall be deemed as an original execution.

Dated: October 27, 2020
New York, New York

SULLIVAN & CROMWELL LLP

/s/ Joseph E. Neuhaus

Joseph E. Neuhaus
Sergio J. Galvis
James L. Bromley
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
neuhausj@sullcrom.com
galviss@sullcrom.com
bromleyj@sullcrom.com

Angela N. Ellis
SULLIVAN & CROMWELL LLP
1700 New York Avenue, N.W. Suite 700
Washington, D.C. 20006-5215
Telephone: 202-956-7500
Facsimile: 202-293-6330
ellisan@sullcrom.com

*Attorneys for Defendant Bolivarian Republic of
Venezuela*

Dated: October 27, 2020
Washington, D.C.

ROBBINS, RUSSELL, ENGLERT, ORSECK,
UNTEREINER & SAUBER LLP

/s/ Joshua S. Bolian

Gary A. Orseck (*pro hac vice*)

Joshua S. Bolian

2000 K Street, N.W.

Washington, DC 20006

Telephone: (202) 775-4500

Facsimile: (202) 775-4510

Email: jbolian@robbinsrussell.com

Attorneys for Plaintiffs

SO ORDERED this ____ day of _____, 2020.

Honorable Louis L. Stanton
United States District Court Judge